



SDMS DocID 2075604

Via Overnight Delivery and E-Mail

January 19, 2007

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Site, Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

The following is submitted by Owens-Illinois, Inc., Three O-I Plaza, One Michael Owens Way, Perrysburg, Ohio 43551-2999 ("Respondent"), in response to the U.S. EPA's November 3, 2006 Request for Information pursuant to Section 104(e) of CERCLA, relating to information, if any, in the possession of Respondent with respect to the above-referenced Site.

If you have any questions regarding this response, please do not hesitate to call me at (567) 336 -8699.

Respectfully submitted,



Susan L. Smith, Counsel
Owens-Illinois, Inc.
Three O-I Plaza – Legal Department
One Michael Owens Way
Perrysburg, OH 43551-2999

Enclosures

GENERAL OBJECTIONS:

1. Respondent objects to the Request for Information on the grounds that it is unduly burdensome and overly broad and seeks information for an unreasonably long period of time and seeks documents that are not within the possession, custody or control of Respondent.
2. Respondent objects to any request by the EPA to produce any material which is subject to attorney-client privilege or other privilege, or which constitutes protected attorney-work product.
3. Respondent objects to any attempt by EPA to create a continuing duty for Respondent to supplement its responses on the grounds that such instruction exceeds the statutory authority of CERCLA. Without waiving its objection, Respondent will voluntarily supplement its responses in the event it becomes aware of any new information or any information that demonstrates that its response was incorrect when made, though believed to be correct when made, or is no longer true.

Without waiving any of the foregoing general objections, Respondent responds to the specific Requests for Information as follows:

1. Describe in detail the business relationship between O-I and Safety Light.

1. Response:

Without waiving any of the foregoing general objections, Respondent has been unable to locate any information or documents that demonstrate that any business relationship existed between O-I and Safety Light Corporation.

2. Did O-I ever transport and/or broker hazardous substances and/or radioactive waste or other wastes to the Site (including, but not limited to, spent or expired "EXIT" signs or other devices, and the like), for disposal or reclamation?

2. Response:

Without waiving any of the foregoing general objections, Respondent has no information that it sent any hazardous substances or wastes to the Site.

3. If you answered "yes" to Question 2, please answer the following questions:
 - a. Provide the name, current address (or most recent address available), telephone number, and contact person for each

customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.

- b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.
- c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:
 - i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);
 - ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;
 - iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;
 - iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
 - v. all personal and/or internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with. U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;
 - vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.

3. Response:

Not applicable; Respondent did not answer "yes" to Question 2.

- 4. Did O-I ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?

4. Response:

Without waiving any of the foregoing general objections, Respondent has located no information or documents that demonstrate that it utilized any of the following companies for disposal or reclamation of wastes: U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite or the Site.

5. If you answered "yes" to Question 4, please address the following issues:

- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:
 - i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;
 - ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;
 - iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
 - iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
 - v. the method of treatment and/or disposal of the above.
- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:
 - i. disposed of or treated radioactive or hazardous materials at the Site;
 - ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and

- iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.
- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:
 - i. the persons with whom you, or other such persons, made such arrangements;
 - ii. every date on which such arrangements took place;
 - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
 - iv. the precise locations at which each material was disposed or treated at the Site;
 - v. the persons who selected the Site as the place at which materials were disposed or treated;
 - vi. the final disposition of each material involved in such transactions; and
 - vii. the names of employees, officers, owners, and agents for each transporter.
- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:
 - i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and
 - ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.
- e. Provide the names, titles, and areas of responsibility of any persons, including all O-I employees, present and former, who are knowledgeable

of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.

- f. Describe any permits or applications and any correspondence between O-I and any regulatory agencies regarding materials transported to or disposed of at the Site.
- g. Provide copies of any correspondence between O-I and any third party regarding materials transported or disposed of at the Site.
- h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
- i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
- j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.
- k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

5. Response:

Not applicable; Respondent did not answer "yes" to Question #4.

- 6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

6. Response:

Without waiving any of the foregoing general objections, Respondent has no knowledge or information as to the identity of any persons who would be able to provide more detailed or complete responses to any question contained herein, or who would be able to provide additional responsive documents.

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

7. Response:

Without waiving any of the foregoing general objections, Respondent has no knowledge or information as to the identity of any persons who would be able to provide information or documents that would be responsive to these requests for information.

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

8. Response:

Without waiving any of the foregoing general objections, Respondent has no knowledge or information as to the identity of other parties who may have information regarding the Site or who may have contributed to the contamination at the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site.

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:
- a. Your document retention policy;
 - b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
 - c. A description of the type of information that would have been contained in the documents; and
 - d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

9. Response:

Without waiving any of the foregoing general objections, Respondent's response to Request #4 is also responsive to this Request.

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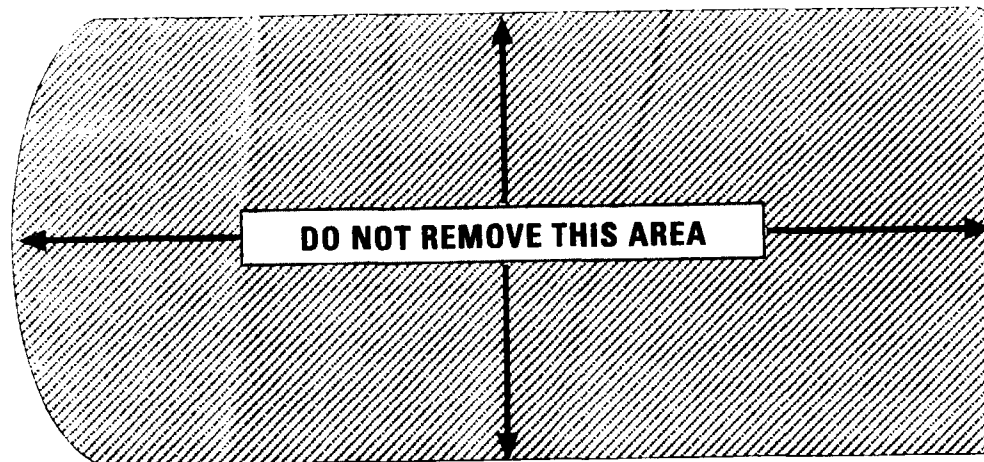
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